

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

*Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq et. al.*, No. 1:04-cv-01076 (GBD)(SN)

*Horace Morris, et al. v. Islamic Republic of Iran*, No. 1:18-cv-05321 (GBD)(SN)

*Matthew Rowenhorst, et al. v. Islamic Republic of Iran*, No. 1:18-cv- 12387 (GBD)(SN)

*Susan M. King, et al. v. Islamic Republic of Iran*, No. 1:22-cv-05193 (GBD)(SN)

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Federal Rules of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the parties identified in Exhibit A in the above referenced actions. The individuals being substituted into the cases are the Personal Representatives of individuals killed as a result of the terrorist attacks on September 11, 2001.

Exhibit A identifies the individuals to be substituted in the pleading, including the capacity in which they seek to be substituted, state of residency at the time the complaint was filed, the existing pleading that refers to the plaintiff, and the 9/11 decedent of which the plaintiff is the Personal Representative.

Plaintiffs propose that, upon endorsement of Plaintiffs' Proposed Order, the substituted parties be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of the Court's Office and the size of this MDL.

Dated: June 3, 2025

/s/ Jerry S. Goldman

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**EXHIBIT A to Motion to Substitute Party**

	<b>Previous Personal Representative:</b>	<b>Case Number:</b>	<b>Substituted Personal Representative:</b>	<b>State of Residency of Substituted Personal Representative at Filing:</b>	<b>Decedent's Name:</b>
1.	Ayleen Arroyo, as the Personal Representative of the Estate of Ayleen J. Santiago, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Ayleen J. Santiago	1:04-cv-01076 (GBD)(SN); 1:22-cv-05193 (GBD)(SN)	Ayleen Arroyo, as the co-Personal Representative of the Estate of Ayleen J. Santiago, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Ayleen J. Santiago  George J. Santiago, as the co-Personal Representative of the Estate of Ayleen J. Santiago, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Ayleen J. Santiago	NJ; NJ	Ayleen J. Santiago
2.	Theresa Russo-Kempf, as the Personal Representative of the Estate of Edward Rowenhorst, deceased, and on behalf of all survivors and all	1:18-cv-12387 (GBD)(SN)	Theresa Russo-Kempf, as the Personal Representative of the Estate of Michael Russo, deceased, and on behalf of all survivors and all legally entitled	NY	Michael Russo

	legally entitled beneficiaries and family members of Michael Russo		beneficiaries and family members of Michael Russo		
3.	Hillary Hans, as the Personal Representative of the Estate of Ronald J. Ruben, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Ronald J. Ruben	1:18-cv-05321 (GBD)(SN)	<p>Hillary Hans, as the co-Personal Representative of the Estate of Ronald J. Ruben, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Ronald J. Ruben</p> <p>Leslie C. Ruben, as the co-Personal Representative of the Estate of Ronald J. Ruben, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Ronald J. Ruben</p>	NJ;NJ	Ronald J. Ruben